

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>20- 236</u>
v.	:	DATE FILED: <u>8/5/2020</u>
MARK HILLIS,	:	VIOLATIONS:
a/k/a "Daddy,"	:	18 U.S.C. § 2422(b) (use of an interstate
a/k/a "Denverpolice#666"	:	commerce facility to entice a minor to
	:	engage in sexual conduct – 1 count)
	:	18 U.S.C. § 2423(b) (travel with intent to
	:	engage in illicit sexual conduct – 1 count)
	:	18 U.S.C. § 2251(a), (e) (manufacture and
	:	attempted manufacture of child
	:	pornography – 9 counts)
	:	18 U.S.C. § 1470 (transfer of obscene
	:	material to a minor – 2 counts)
	:	18 U.S.C. § 2252(a)(4)(B), (b)(1)
	:	(possession of child pornography – 1
	:	count)
	:	18 U.S.C. 2(b) (willfully causing)
		Notices of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between on or about November 23, 2019, through on or about December 29, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a "Daddy,"
a/k/a "Denverpolice#666,"**

used and attempted to use a facility and means of interstate and foreign commerce, that is, the Internet and a cellular phone network, to persuade, induce, entice and coerce Minor #1, who had not attained the age of 18 years and who is known to the grand jury, to engage in sexual activity for which any person could be charged with a criminal offense, that is, the manufacture and attempted manufacture of child pornography, in violation of Title 18, United States Code, Section

2251(a), (e), and the transfer of obscene material to a minor, in violation of Title 18, United States Code, Section 1470.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

THE GRAND JURY CHARGES THAT:

Between or about December 27, 2019, through on or about December 29, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

traveled in interstate commerce, from Michigan to Pennsylvania, for the purpose of engaging in illicit sexual conduct with another person who had not attained the age of 18 years, that is, Minor #1.

In violation of Title 18, United States Code, Section 2423(b).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 21, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

MARK HILLIS
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 22, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e) and 2(b).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 23, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a "Daddy,"
a/k/a "Denverpolice#666,"**

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 24, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 25, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 26, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 27, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 29, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

employed, used, persuaded, induced, enticed and coerced Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by soliciting Minor #1 to photograph herself engaging in a sexually explicit conduct and directing her to transmit the image to defendant MARK HILLIS via a cellular telephone network, and HILLIS knew and had reason to know that the visual depiction would be transported and transmitted using a facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the visual depiction was produced and transmitted using materials that had been mailed and shipped and transported in and affecting interstate or foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), (e), and 2(b).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 25, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

using a means and facility of interstate commerce, knowingly transferred obscene matter to Minor #1, who had not attained the age of 16 years, and defendant HILLIS knew Minor #1 had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 29, 2019, in the Eastern District of Pennsylvania, the Eastern District of Michigan, and elsewhere, defendant

**MARK HILLIS,
a/k/a "Daddy,"
a/k/a "Denverpolice#666,"**

using a means and facility of interstate commerce, knowingly transferred obscene matter to Minor #1, who had not attained the age of 16 years, and defendant HILLIS knew Minor #1 had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 31, 2019, in the Eastern District of Pennsylvania, defendant

**MARK HILLIS,
a/k/a “Daddy,”
a/k/a “Denverpolice#666,”**

knowingly possessed matter, that is, a cellular phone bearing serial number DX5Z598THG6W, which contained visual depictions that had been mailed and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that were produced using materials that had been mailed and shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B), (b)(1).

NOTICE OF FORFEITURE NO. ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1470, as set forth in this indictment, defendant

**MARK HILLIS,
a/k/a "Daddy,"
a/k/a "Denverpolice#666,"**

shall forfeit to the United States of America:

(a) any obscene material produced, transported, mailed, shipped, or received in violation of Section 1470;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, including, but not limited to:

(1) One Apple cellphone, model iPhone 7, serial number: DX5Z598THG6W; and

(2) One Samsung cellphone, model Galaxy J3, serial number: F6FEA21B26A6085E.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1467(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 1467.

NOTICE OF FORFEITURE NO. TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2251(a) and 2252(a)(4)(B), as set forth in this indictment, defendant

**MARK HILLIS,
a/k/a "Daddy,"
a/k/a "Denverpolice#666,"**

shall forfeit to the United States of America:

(a) any visual depiction described in Sections 2251 and 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the indictment;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violations; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations, including, but not limited to:

(1) One Apple cellphone, model iPhone 7, serial number:
DX5Z598THG6W; and

(2) One Samsung cellphone, model Galaxy J3, serial number:
F6FEA21B26A6085E.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2253.

NOTICE OF FORFEITURE NO. THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2422(b) and 2423(b), as set forth in this indictment, defendant

**MARK HILLIS,
a/k/a "Daddy,"
a/k/a "Denverpolice#666,"**

shall forfeit to the United States of America:

(a) any property, real or personal, that constitutes or is derived from proceeds traceable to such violations; and

(b) any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violations, including, but not limited to:

(1) One Apple cellphone, model iPhone 7, serial number: DX5Z598THG6W; and

(2) One Samsung cellphone, model Galaxy J3, serial number: F6FEA21B26A6085E..

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

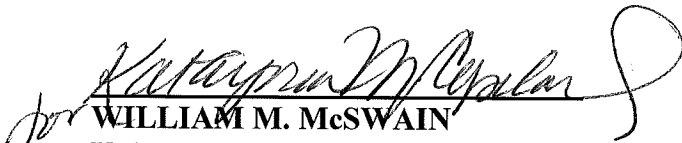
it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2428 and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



GRAND JURY FOREPERSON


WILLIAM M. McSWAIN
United States Attorney

20-236

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

MARK HILLIS
a/k/a "Daddy,"
a/k/a "Denverpolice#666"

INDICTMENT

Counts

18 U.S.C. § 2422(b) (use of an interstate commerce facility to entice a minor to engage in sexual conduct - 1 count); 18 U.S.C. § 2423(b) (travel with intent to engage in illicit sexual conduct - 1 count); 18 U.S.C. § 2251(a), (e) (manufacture and attempted manufacture of child pornography - 9 counts); 18 U.S.C. § 1470 (transfer of obscene material to a minor - 2 counts); 18 U.S.C. § 2252(a)(4)(B), (b)(1) (possession of child pornography - 1 count); 18 U.S.C. § 2(b) (willfully causing); Notices of forfeiture

Attorney's bill



Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____